

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**Hearing Date: May 28, 2025  
Hearing Time: 10:00AM**

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In Re:

Case No. 18-23674  
Chapter 11

Joseph T Granchelli,

Debtor

Assigned to:  
Hon. Sean H. Lane  
Bankruptcy Judge

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**MOTION TO APPROVE STIPULATION**

Deutsche Bank National Trust Company, as Trustee for HSI Asset Loan Obligation Trust 2007-1 (hereinafter “Creditor”), secured creditor of the aforementioned Debtor, by and through its counsel, McCabe, Weisberg & Conway, LLC, hereby brings this Motion to Approve Stipulation, entered, and further states as follows:

1. Creditor has a secured claim that encumbers the real property located at 1071 Grove Street, Rye, New York 10543.
2. Pursuant to an Order on Debtor’s Motion to Sell, Earth Improvements did not close on the Property.
3. Secured Creditor and Earth Improvements have come to an agreement and have executed the Stipulation, attached as Exhibit “A”.
4. Pursuant to the Stipulation, Earth Improvements is responsible for paying any escrow disbursements that may come due prior to the closing of the Property. As of May 2, 2025, there was an additional escrow disbursement in the amount of \$3,357.29.
5. The additional escrow disbursement in the amount of \$3,357.29 and any other

escrow disbursements prior to the closing, will need to be paid by Earth Improvements to Creditor.

6. By virtue of the foregoing, Parties seek to have this Stipulation Approved by this Honorable Court.

**WHEREFORE**, for the foregoing reasons, Creditor prays that the Stipulation be approved by this Honorable Court.

Dated: New Rochelle, New York  
May 6, 2025

By: /s/ Melissa S. DiCerbo  
Melissa S. DiCerbo, Esq.  
McCabe, Weisberg & Conway, LLC  
Attorneys for Secured Creditor